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December 4, 2019

VIA ECF

The Honorable Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Furman_NYSDChambers@nysd.uscourts.gov

Re: Usherson v. Bandshell Artist Management, 1:19-cv-6368 (JMF) Letter Brief
Regarding Filing Under Seal

Dear Judge Furman,

Per this Court's November 20, 2019 Order (Dkt 26), Defendant Bandshell Artist Management submits the following statement regarding any need to keep the filings sealed with regards to Defendant's Motion for Sanctions, and apologizes that, even with the Thanksgiving holiday, this letter should have been filed on December 2.

Defendant does not believe that there is any need for sealing. As the Court noted, there is a strong presumption in favor of public access to judicial documents. Defendant, in some of the exhibits it attached, made very minor redactions simply to remove certain specific monetary terms of settlement discussions it did not believe were material to the substance of the motion. As such, Defendant does not believe the papers, as submitted, need to continue to be sealed.

Respectfully submitted,

s/Brad R. Newberg/

Brad. R. Newberg

*Attorney for Defendant Bandshell Artist
Management.*